

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to: *All Actions*

**DECLARATION OF ROBERT T. HAEFELE TRANSMITTING EVIDENCE
IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO
DEFENDANTS' MOTION TO EXCLUDE EXPERT TESTIMONY OF BRIAN
JENKINS AND JONATHAN WINER**

I, Robert T. Haeefe, pursuant to 28 U.S.C. §1746, declare, under penalty of perjury, that the following statements are true and correct:

1. I am an attorney admitted to practice in the above-captioned matter, a member of the Plaintiffs' Executive Committees in this MDL, and associated with the law firm Motley Rice LLC, counsel for plaintiffs in this MDL.
2. I submit this Declaration to identify and transmit into evidence the exhibits referenced in Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Exclude Expert Testimony of Brian Jenkins and Jonathan Winer.
3. Attached hereto are true and correct copies of the Exhibits identified below.
4. Exhibit A is excerpted pages from the Deposition of John T. Sidel, taken on April 27, 2021.
5. Exhibit B is excerpted pages from the Deposition of Olivier Roy, taken on April 20, 2021.
6. Exhibit C is excerpted pages from the Deposition of Jonathan Winer, taken on July 13, and July 14, 2021.

7. Exhibit D is a copy of the Expert Report of Jonathan Winer on behalf of the plaintiffs, dated March 10, 2020.
8. Exhibit E is a copy of *The Finance of Illicit Resource Extraction* authored by Jonathan Winer and Trifin J. Roule and published in “Natural Resources and Violent Conflict” in 2003.
9. Exhibit F is a copy of *Countering Terrorism Finance: A Work, Mostly in Progress* authored by Jonathan Winer for The Annals of the American Academy of Political Science, published in “Terrorism: What will the Next President Face” in July 2008.
10. Exhibit G is a copy of *Fighting Terrorist Finance* authored by Jonathan Winer and Trifin J. Roule and published in “Survival” in 2002.
11. Exhibit H is a copy of the *The Road to 9/11: The September 11 Terrorist Attack on the World Trade Center*, which serves as Brian Michael Jenkins’ affirmative expert report in this case, dated March 10, 2020.
12. Exhibit I is excerpted pages from the Deposition of Brian Michael Jenkins, taken on April 12, 2021.
13. Exhibit J is excerpted pages from the 9/11 Commission Report.
14. Exhibit K is excerpted pages from the Deposition of Jonathan Marks, taken on July 22, 2021.
15. Exhibit L is a copy of the Expert Report of Jonathan T. Marks on behalf of World Assembly of Muslim Youth, dated August 7, 2020.
16. Exhibit M is a compilation of documents produced by Wa’el Jelaidan in this litigation.
17. Exhibit N is a compilation of documents produced by the Muslim World League in this litigation.

18. Exhibit O is a compilation of documents produced by the International Islamic Relief Organization in this litigation.

19. Exhibit P is a copy of the Expert Report of John Sidel, dated July 29, 2020.

20. Exhibit Q is a copy of the Supplement Expert Witness Statement of Jonathan Winer, date February 2, 2021.

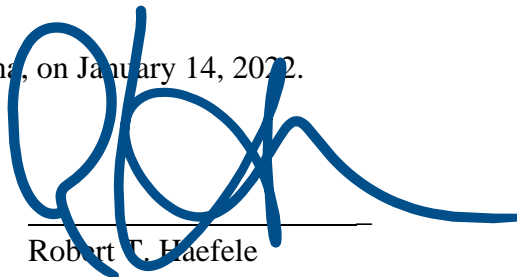
21. Exhibit R is a June 2021 email exchange between Plaintiffs' Counsel and Counsel for WAMY regarding WAMY Expert Khalid Blankinship.

22. Exhibit S is an excerpted portion of a letter dated January 27, 2021, from WAMY Counsel regarding the "57" audit reports purportedly reviewed by aids to WAMY Expert Jonathan Marks.

23. Exhibit T is excerpted pages from the Deposition of Ambassador Charles W. Freeman, taken on April 6, 2021.

24. Exhibit U is Plaintiffs' responsive catalog to Defendants' catalog that was submitted as Exhibit D at ECF No. 7344.

Executed in Mount Pleasant, South Carolina, on January 14, 2022.



Robert T. Haefele